

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ABBY B. CONLEY,

Plaintiff

JURY TRIAL DEMANDED

v.

COUNTY OF ERIE, ERIE COUNTY OFFICE
OF CHILDREN AND YOUTH, a/k/a ERIE
COUNTY CHILD WELFARE SERVICE,
RICHARD SCHENKER, individually and in
his capacity as County Executive of Erie
County, Pennsylvania, PETER CALLAN,
individually and in his capacity as Erie County
Director of Personnel, DEBRA LIEBEL,
individually and in her capacity as Executive
Director, Erie County Office of Children and
Youth, a/k/a Erie Child Welfare Service and
JOHN A. ONORATO, ESQUIRE, individually
and in his capacity as Erie County Solicitor,

Civil Action No.: 05-76E

The Honorable Sean J. McLaughlin

Defendants

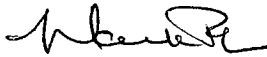
CERTIFICATE OF COMPLIANCE

1. On January 9, 2006, the undersigned counsel for Defendant John A. Onorato served counsel for Plaintiff Abby B. Conley with a Third Set of Interrogatories and Requests for Production of Documents directed to the Plaintiff relative to the above case.
2. On February 28, 2006, the undersigned counsel sent counsel for Plaintiff correspondence requesting answers to the Third Set of Interrogatories and Requests for Production of Documents.
3. To date, Plaintiff's counsel has failed to provide responses to the discovery requests and has failed to respond to the February 28, 2006 correspondence.

4. The undersigned counsel made a good faith attempt to confer with Plaintiff's counsel in an effort to obtain full and complete discovery responses without court action.

Respectfully Submitted:

DELL MOSER LANE & LOUGHNEY, LLC



Mark R. Lane, Esquire

Pa. I.D. No. 61923

Attorneys for Defendant, John A. Onorato, Esquire

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